

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	Case No. 1:25-CR-40
	:	
Plaintiff,	:	Judge Hopkins
	:	Magistrate Judge Bowman
v.	:	
	:	<u>MOTION TO CONTINUE</u>
ERNEST CHAVEZ,	:	<u>ARRAIGNMENT DATE</u>
	:	
Defendant.	:	

Defendant Ernest Chavez (“Mr. Chavez”), by and through counsel, respectfully requests that this Court continue his arraignment date, currently scheduled for May 20, 2025. The extension requested is for about one month, perhaps to the week of June 16-20, 2025.

As background, a multiple-count indictment was returned against Mr. Chavez and others on or about April 23, 2025 (at this time, the Indictment remains sealed).

Mr. Chavez lives in Arizona and was released on his own recognizance after his arrest. Although his arraignment in the Southern District of Ohio in Cincinnati has been scheduled for May 20, 2025, Mr. Chavez is finding it difficult to get to Cincinnati on that date.

The undersigned counsel, who has not been officially appointed to represent Mr. Chavez, has been asked to assist on this issue. Mr. Chavez has very limited funds

because he has been out of work since the fall of 2024 due to injury he sustained at his workplace. As discussed in his medical report, the pain has persisted into March 2025 and is still continuing (see, medical report, filed under seal, redacted). Despite the injury, Mr. Chavez has been offered a job with the Phoenix Suns, starting on or about May 21, 2025, the day after he is supposed to be in Cincinnati. At this time, travel to Cincinnati would be extremely difficult without time and planning.

Counsel has tried to see if a video arraignment is an option, but the prosecutor has been very resistant to this idea. At this time, a bus may be the best option for travel (without him being further incarcerated).<sup>1</sup>

Counsel for Mr. Chavez was able to contact Assistant United States Attorney Adam Cullman and he is aware that this motion would be filed.

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<sup>1</sup> About 20-25 years ago, I remember a situation where the U.S. Marshals paid for a bus ticket. I would have to look up the provision in the code and see if this case fits the criteria, but again that would take time to explore.

Based upon the foregoing, Mr. Chavez respectfully requests that his currently scheduled May 20, 2025 arraignment date be continued for about one month, perhaps to the week of June 16-20, 2025.

Respectfully submitted,

s/C. Ransom Hudson

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Counsel for Defendant

Ernest Chavez

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon Adam Cullman, Assistant United States Attorney, and all other counsel of record by electronic filing, on May 14, 2025.

s/C. Ransom Hudson

C. Ransom Hudson (0061332)